Internal Revenue Service

/20.200	1 (0) 551 501	57,000,5/0
432,320 4,259,140	1,606,551,781 14,926,629	57,989,543 175,889
906,663	2,761,111	47,221
8,423,114	20,372,655	604,707
2,282,937	16,076,012	705,598
66,285,468	179,715,041	3,566,015
7,765,468	29,440,437	1,405,500
9,663,283	29,299,094	378,574
1,948,833	10,202,519	20,564
1,585,649	14,270,260	8,107
36,943,224	80,000,176	964,934
9,911,746	46,466,254	3,155,922
1,820,109	4,341,029	185,922
1,734,272	5,814,711	185,136
19,680,063	82,400,136	32,747
5,607,673 2,656,746	28,251,515 12,333,530	1,879,155 $408,771$
3,106,197	12,650,055	161,275
3,285,175	16,383,604	1,484,995
3,373,608	22,211,867	150,423
1,278,878	4,248,091	305,776
8,847,187	37,266,856	169,311
13,311,609	47,715,564	112,598
8,889,841	52,127,749	528,378
6,684,641	49,103,004	243,624
1,721,668	6,876,816	1,388,240
5,999,022	30,902,109	275,915
1,126,834	2,624,052	1,042,439
1,916,546	8,900,001	51,192
6,256,039 1,871,637	9,279,131 6,432,668	103,159 $87,070$
14,712,728	73,752,255	79,896
1,801,649	5,235,672	1,609,125
36,540,727	134,356,183	27,653
8,684,062	39,323,108	1,143,565
707,331	2,272,331	318,756
10,330,930	62,314,295	20,282
4,257,011	12,048,707	427,017
4,379,128	16,019,389	5,647,913
15,041,366	70,797,849	207,549
1,356,882	6,507,650	2,775,417
3,942,183 1,331,186	25,246,952 2,654,234	7,442 $439,600$
6,054,796	33,350,510	31,646
31,945,128	112,353,278	911,315
2,875,240	8,426,021	20,702,545
766,290	2,553,679	601,852
11,022.591	38,638,536	27,657
10.967,692	35,266,519	1,341,656
1,137,839	4,273,177	1,073,518
6,299,959	28,481,964	111,654
1,413,201	1,704,024	333,532
332,768	1,864,125	234,763
304,348	3,010,438 $1,747,090$	4,278
2,391,059 118,512	48,552	$1,205 \\ 207,332$
2,213,400	621,808	2,053
59,147	452,953	598,502
59,147	100,973	7,641
2,304,266	961,118	59,140
72,379,610	1,439,259	11,158,589
73,733,156	1,745,480	12,502,451
65,990,832	1,796,227	12,708,171
61,779,556	1,971,614	15,004,486
74,179,370	2,110,992	17,002,504

2007

OCTOBER 1, 2006 SEPTEMBER 30, 2007



Department of the Treasury Internal Revenue Service

Linda E. Stiff

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Mark J. Mazur

Director, Research, Analysis, and Statistics

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The IRS Mission

Provide America's taxpayers top quality service by helping them understand and meet their tax responsibilities and by applying the tax law with integrity and fairness to all.

Enforcement

Examinations

ables 9 through 12 provide information about examinations of most types of tax returns. Table 9 provides an overview of examinations of income tax returns, estate and gift tax returns, employment tax returns, excise tax returns, and certain other business tax returns. Table 10 provides additional information about those examinations in which the taxpayer did not agree with the IRS examiner's determination. Table 11 provides information on examinations that prevented the erroneous payment of refunds. Table 12 shows the number of examinations that resulted in additional refunds paid to the taxpayer and the amount of refunds recommended.

Table 13 provides information about examinations of tax-exempt organizations, such as charitable organizations and foundations, and employee retirement plans. These organizations generally do not owe Federal income tax. However, tax-exempt organizations may owe additional payroll taxes, unrelated business income tax, or excise taxes. In addition, changes to exempt organization returns may lead to adjustments on related taxable returns. Examinations of related returns are also included in Table 13 (and excluded from Tables 9 through 12).

Table 9. Examination Coverage: Recommended and Average Recommended Additional Tax After Examination, by Type and Size of Return, Fiscal Year 2007

		Returns examined				
Type and size of return	Returns filed in Calendar Year 2006 [1]	Total	Percentage covered	Field [2]	Correspondence	
•	(1)	(2)	(3)	(4)	(5)	
United States, total	179.419.771	1,550,922	0.9	449,215	1,101,707	
Taxable returns:	-, -,	, , .		., .	, , , ,	
Individual income tax returns, total	134,542,879	[3] 1,384,563	1.0	311,339	1,073,224	
Returns with TPI under \$200,000 [4]:						
Nonbusiness returns without earned income tax credit:						
Selected nonbusiness returns [5]	76,729,589	297,545	0.4	55,131	242,414	
With Schedule E or Form 2106 [6]	14,158,305	165,137	1.2	40,498	124,639	
Business and nonbusiness returns	11,100,000	100,107	1.2	10,100	121,000	
with earned income tax credit						
by size of TGR [7,8]:						
Under \$25,000	21,613,857	[9] 400,206	1.9	10,908	389,298	
\$25,000 or more	1,404,507	[9] 135,850	9.7	33,928	101,922	
Business returns without						
earned income tax credit:						
Nonfarm business returns by size of TGR [7]:	10.050.000	10.1	4.5	F0.055	24	
Under \$25,000	10,356,000	134,329	1.3	53,092	81,237	
\$25,000 under \$100,000	3,076,877	62,876	2.0	31,363	31,513	
\$100,000 under \$200,000 \$200,000 or more	912,280 698,893	56,327 13,049	6.2 1.9	28,286 11,319	28,041 1,730	
Farm returns	1,528,390	5,705	0.4	3,033	2,672	
Returns with TPI at least \$200,000	1,020,000	5,700	т.0	0,000	2,012	
and under \$1,000,000:						
Nonbusiness returns	2,482,382	48,944	2.0	13,882	35,062	
Business returns	1,121,182	32,779	2.9	17,499	15,280	
Returns with TPI of \$1,000,000 or more	339,138	31,382	9.3	12,259	19,123	
International returns [10]	121,479	434	0.4	141	293	
Corporation income tax returns,						
except Form 1120S, total [11]	2,256,485	30,004	1.3	27,972	2,032	
Returns other than Form 1120-F [12]:	0.474.444	00.000		10.000	4 740	
Small corporations [13]	2,171,144	20,020	0.9	18,302	1,718 467	
No balance sheet returns Balance sheet returns by size	402,915	2,186	0.5	1,719	407	
of total assets:						
Under \$250,000	1,183,402	9,038	0.8	8,131	907	
\$250,000 under \$1,000,000	372,953	4,836	1.3	4,671	165	
\$1,000,000 under \$5,000,000	181,442	3,032	1.7	2,896	136	
\$5,000,000 under \$10,000,000	30,432	928	3.0	885	43	
Large corporations [14]	57,357	9,644	16.8	9,376	268	
Balance sheet returns by size						
of total assets:						
\$10,000,000 under \$50,000,000	29,869	4,473	15.0	4,398	75	
\$50,000,000 under \$100,000,000	7,057	801	11.4	766	35	
\$100,000,000 under \$250,000,000	7,847	946	12.1	904	42	
\$250,000,000 under \$500,000,000 \$500,000,000 under \$1,000,000,000	4,438 3,163	634 584	14.3 18.5	580 573	54 11	
\$1,000,000,000 under \$1,000,000,000	3,163	1,152	31.6	1,116	36	
\$5,000,000,000 under \$5,000,000,000 \$5,000,000,000 under \$20,000,000,000	965	607	62.9	596	11	
\$20,000,000,000 and above	374	447	[15] 119.5	443	4	
Form 1120-F returns [12]	27,984	340	1.2	294	46	
Estate and trust income tax returns	3,751,386	4,544	0.1	1,235	3,309	
Estate tax returns:					·	
Total	59,978	4,616	7.7	4,616	0	
Size of gross estate:						
Under \$5,000,000	51,940	3,017	5.8	3,017	0	
\$5,000,000 or more	8,038	1,599	19.9	1,599	0	
Gift tax returns	264,315	1,490	0.6	1,490	0	
Employment tax returns	30,803,939	56,738	0.2	40,748	15,990	
Excise tax returns Other taxable returns [16]	896,462	36,018	4.0	34,520	1,498	
Other taxable returns [16] Nontaxable returns:	[17]	1,460	[17]	1,442	18	
Partnership returns, Form 1065	2,934,597	12,195	0.4	8,871	3,324	
S corporation returns, Form 1120S [18]	3,909,730	17,657	0.5	16,792	865	
Estate and trust returns, Form 1041	[17]	1,637	[17]	190	1,447	
Income, estate, and gift tax,		,			,	
		1,456,706	1.0	372,505	1,084,201	

Table 9. Examination Coverage: Recommended and Average Recommended Additional Tax After Examination, by Type and Size of Return, Fiscal Year 2007—Continued

		je of returns rith no change	Re	commended additional tax (thousands of dollars)		Average recommended additiona tax per return (dollars)	
Type and size of return	Field [2]	Corres- pondence	Total	Field [2]	Corres- pondence	Field [2]	Corres- pondence
	(6)	(7)	(8)	(9)	(10)	(11)	(12)
United States, total	[17]	[17]	44,370,539	34,810,837	9,559,702	77,493	8,677
Taxable returns:	,		.,,,	2 1,2 12,221	-,,	,	2,011
Individual income tax returns, total	12	16	[19] 15,705,155	6,357,090	9,348,065	20,419	8,710
Returns with TPI under \$200,000 [4]:							
Nonbusiness returns without							
earned income tax credit:	47	24	4 404 440	F04.004	050 500	0.504	0.704
Selected nonbusiness returns [5] With Schedule E or Form 2106 [6]	17 	21 10	1,184,446 759,884	524,884 283,176	659,562 476,708	9,521 6,992	2,721 3,825
Business and nonbusiness returns		10	759,004	203,170	470,700	0,992	3,623
with earned income tax credit							
by size of TGR [7,8]:							
Under \$25,000	12	15	1,264,786	52,524	1,212,262	4,815	3,114
\$25,000 or more	9	8	501,977	215,749	286,228	6,359	2,808
Business returns without							
earned income tax credit:							
Nonfarm business returns by size of TGR [7]:	_				0.00		
Under \$25,000	8	14	1,154,236	256,753	897,483	4,836	11,048
\$25,000 under \$100,000	10 9	13	569,858	198,210	371,648	6,320	11,793
\$100,000 under \$200,000 \$200,000 or more	18	5 42	1,610,565 192,777	695,318 180,638	915,247 12,139	24,582 15,959	32,640 7,017
Farm returns	18	42	41,207	27,923	13,284	9,206	4,972
Returns with TPI at least \$200,000			,20.	21,020	.0,20.	0,200	.,0.2
and under \$1,000,000:							
Nonbusiness returns	18	37	1,298,718	382,911	915,807	27,583	26,120
Business returns	20	33	875,821	365,373	510,448	20,880	33,406
Returns with TPI of \$1,000,000 or more	24	28	6,250,049	3,173,070	3,076,979	258,836	160,905
International returns [10]	28	15	831	561	270	3,979	922
Corporation income tax returns,	24	44	05 744 407	05.000.000	F2 200	040.250	20, 200
except Form 1120S, total [11] Returns other than Form 1120-F [12]:	34	41	25,741,487	25,688,088	53,399	918,350	26,280
Small corporations [13]	38	37	693,890	690,773	3,117	37,743	1,814
No balance sheet returns	25	29	194,092	193,730	362	112,699	775
Balance sheet returns by size			,	,		,	
of total assets:							
Under \$250,000	40	32	204,223	202,753	1,470	24,936	1,621
\$250,000 under \$1,000,000	38	48	111,598	111,243	355	23,816	2,152
\$1,000,000 under \$5,000,000	41	70	135,273	134,437	836	46,422	6,147
\$5,000,000 under \$10,000,000	41	74	48,704	48,610	94	54,927	2,186
Large corporations [14]	29	58	24,942,449	24,892,167	50,282	2,654,881	187,619
Balance sheet returns by size of total assets:							
\$10,000,000 under \$50,000,000	36	59	396,970	351,311	45,659	79,880	608,787
\$50,000,000 under \$100,000,000	28	49	85,295	84,987	308	110,949	8,800
\$100,000,000 under \$250,000,000	24	60	319,619	315,963	3,656	349,517	87,048
\$250,000,000 under \$500,000,000	20	50	665,368	664,802	566	1,146,210	10,481
\$500,000,000 under \$1,000,000,000	20	82	418,922	418,917	5	731,094	455
\$1,000,000,000 under \$5,000,000,000	13	64	3,912,331	3,912,331	0	3,505,673	0
\$5,000,000,000 under \$20,000,000,000	10	82	5,070,726	5,070,638	88	8,507,782	8,000
\$20,000,000,000 and above	7	25	14,073,218	14,073,218	0	31,767,986	0
Form 1120-F returns [12]	47	98	105,148	105,148	2.455	357,646	1 044
Estate and trust income tax returns Estate tax returns:	21	74	149,075	145,620	3,455	117,911	1,044
Total	14	N/A	1,147,801	1,147,801	0	248,657	N/A
Size of gross estate:	.,		.,17,007	.,. 17,001		2.3,007	1973
Under \$5,000,000	14	N/A	297,267	297,267	0	98,531	N/A
\$5,000,000 or more	14	N/A	850,534	850,534	0	531,916	N/A
Gift tax returns	21	N/A	230,833	230,833	0	154,921	N/A
Employment tax returns	13	5	907,852	753,995	153,857	18,504	9,622
Excise tax returns	9	68	235,841	234,915	926	6,805	618
Other taxable returns [16]	28	83	252,495	252,495	0	175,101	0
Nontaxable returns: Partnership returns, Form 1065	44	73	N/A	N/A	N/A	N/A	N/A
S corporation returns, Form 1120S [18]	36	66	N/A	N/A	N/A N/A	N/A	N/A
Estate and trust returns, Form 1041	67	83	N/A	N/A	N/A	N/A	N/A
Income, estate, and gift tax,							
and nontaxable returns, total	16	17	42,974,351	33,569,432	9,404,919	90,118	8,675
Footnotes at end of table.				. ,	· · ·	•	

Table 9. Examination Coverage: Recommended and Average Recommended Additional Tax After Examination, by Type and Size of Return, Fiscal Year 2007—Continued

Footnotes

N/A-Not applicable.

- [1] In general, examination activity is associated with returns filed in the previous calendar year. However, this relationship is only approximate.
- [2] Field examinations are generally performed by revenue agents, tax compliance officers, tax examiners, and revenue officer examiners, in person or by correspondence.
- [3] Includes 503,267 returns selected for examination on the basis of an earned income tax credit (EITC) claim. Excludes 5,607 returns associated with the earned income tax credit qualifying child certification test, which are tracked in IRS's examination database.
- [4] In general, TPI (total positive income) is the sum of all positive amounts shown for the various sources of income reported on the individual income tax return and, thus, excludes net losses. Examinations of individual income tax returns are shown in this table by: TPI of under \$200,000; TPI of at least \$200,000 and under \$1,000,000; and TPI of \$1,000,000 or more.
- [5] Includes returns without a Schedule C (nonfarm sole proprietorship), Schedule E (supplemental income and loss), Schedule F (profit or loss from farming), or Form 2106 (employee business expenses).
- [6] Includes returns with a Schedule E (supplemental income and loss) or Form 2106 (employee business expenses). Excludes returns with a Schedule C (nonfarm sole proprietorship) or Schedule F (profit or loss from farming).
- [7] TGR (total gross receipts) is the sum of gross receipts from farm and nonfarm businesses. It is calculated by adding the positive values of gross receipts and other income from Schedule C to the cost of purchased items and gross income (which can be positive or negative) from Schedule F. Schedule C is used to report profit or loss from nonfarm sole proprietorships. Schedule F is used to report profit or loss from farming. If a taxpayer reports both farm and nonfarm income, the return is classified by the larger source of income.
- [8] Includes both business and nonbusiness returns with an earned income tax credit claim. These returns are classified by size of total gross receipts (TGR). Returns are classified as business if they have a Schedule C (nonfarm sole proprietorship) or Schedule F (profit or loss from farming) and TGR is greater than total positive income (TPI). Returns are classified as nonbusiness returns if TGR is less than TPI. See footnotes 4 and 7.
- [9] Includes returns with an earned income tax credit (EITC) claim. These returns were selected for examination on the basis of an EITC claim or on other selection criteria.
- [10] Includes Forms 1040PR (self-employment tax form for Puerto Rico) and 1040-SS (self-employment tax form for U.S. Virgin Islands, Guam, American Samoa, and the Northern Mariana Islands).
- [11] Includes Forms 1120 ("long form"); 1120-A ("short form"); 1120-F (foreign corporation, except foreign life insurance company); 1120-H (homeowner association); 1120-L (life insurance company); 1120M (mutual insurance company); 1120-PC (property and casualty insurance company); 1120-POL (certain political association); 1120-REIT (real estate investment trust); 1120-RIC (regulated investment company); and 1120-SF (settlement fund). Excludes certain other types of corporations, which are included in "other taxable returns" described in footnote 16.
- [12] Form 1120-F is filed by a foreign corporation with U.S. income, other than a foreign life insurance company and foreign sales corporation.
- [13] Includes returns with assets of less than \$10 million examined by either the Small Business/Self-Employed Operating Division or the Large and Mid-Size Business Operating Division.
- [14] Includes returns with assets of \$10 million or more examined by either the Small Business/Self-Employed Operating Division or the Large and Mid-Size Business Operating Division.
- [15] The percentage of returns examined may be greater than 100 percent of the returns filed in Calendar Year 2006 since examinations may be conducted on returns filed in prior calendar years.
- [16] Includes Forms 1120S for an S corporation reporting a tax (see footnote 18); 1120-FSC (foreign sales corporation); 8288 (withholding tax return for disposition by foreign persons of U.S. property interests); 990-C (farmers' cooperative association); and 8804 (partnership withholding).
- [17] Not tabulated.
- [18] Includes most Forms 1120S, which are filed by qualifying S corporations electing to be taxed through shareholders. Under certain conditions, S corporations are subject to tax and are included in "other taxable returns" in this table.
- [19] Includes \$1,494,377 (thousands) in recommended additional tax (including earned income tax credit) on returns selected for examination on the basis of an earned income tax credit (EITC) claim. Excludes \$12,223 (thousands) in denied EITC related to the qualifying child certification test. These EITC cases are tracked in IRS's examination database.
- NOTES: Detail may not add to totals because of rounding. Excludes excise tax returns filed with the Customs Service and the Alcohol and Tobacco Tax and Trade Bureau, and returns of tax-exempt organizations, Government entities, and employee plans.

Table 10. Examination Coverage: Returns Examined with Unagreed Recommended Additional Tax After Examination, by Type and Size of Return, Fiscal Year 2007 [Money amounts are in thousands of dollars.]

		Taxable returns examined		Amount unagreed		
Type and size of return	Total	Field [1]	Correspondence	Total	Field [1]	Correspondence
	(1)	(2)	(3)	(4)	(5)	(6)
United States, total	40,637	29,645	10,992	22,781,936	22,015,389	766,547
Individual income tax returns, total	[2] 32,983	22,073	10,910	[3] 2747,466	1,981,359	766,107
Returns with TPI under \$200,000 [4]:	<u> </u>	,	-,		, ,	, .
Nonbusiness returns without						
earned income tax credit:						
Selected nonbusiness returns [5]	4,901	2,613	2,288	88,063	70,751	17,312
With Schedule E or Form 2106 [6]	6,779	3,490	3,289	337,646	316,769	20,877
Business and nonbusiness returns						
with earned income tax credit						
by size of TGR [7,8]:						
Under \$25,000	2,270	471	1,799	18,417	11,684	6,733
\$25,000 or more	2,634	2,072	562	34,910	34,049	861
Business returns without						
earned income tax credit:	_					
Nonfarm business returns by size of TGR [-					
Under \$25,000	4,529	3,674	855	78,418	52,371	26,047
\$25,000 under \$100,000	2,161	1,793	368	43,073	36,551	6,522
\$100,000 under \$200,000	2,504	2,148	356	165,667	154,503	11,164
\$200,000 or more	590	536	54	50,183	47,367	2,816
Farm returns	447	d	d	6,387	d	d
Returns with TPI at least \$200,000						
and under \$1,000,000:		4 000		207.422	4=0.000	
Nonbusiness returns	2,266	1,609	657	227,406	178,062	49,344
Business returns	2,071	1,850	221	158,824	147,372	11,452
Returns with TPI of \$1,000,000 or more	1,826	1,479	347	1,538,407	925,730	612,677
International returns [9]	5	d	d	65	d	d
Corporation income tax returns,						
except Form 1120S, total [10]	2,526	2,510	16	18,760,576	18,760,576	[11]
Returns other than Form 1120-F [12]:	4.000	4.000	40	225 452	005 450	
Small corporations [13]	1,398	1,382	16	365,472	365,472	[11]
No balance sheet returns	177	177	0	157,676	157,676	0
Balance sheet returns by size						
of total assets:				22 722		
Under \$250,000	578	564	14	32,729	32,729	[11]
\$250,000 under \$1,000,000	343	d	d	57,347	d	d
\$1,000,000 under \$5,000,000	232	232	0	88,361	88,361	0
\$5,000,000 under \$10,000,000	68	d	d	29,359	d	d
Large corporations [14]	1,108	1,108	0	18,308,946	18,308,946	0
Balance sheet returns by size						
of total assets:	0=0	070		440	440	•
\$10,000,000 under \$50,000,000	270	270	0	143,707	143,707	0
\$50,000,000 under \$100,000,000	61	61	0	26,769	26,769	0
\$100,000,000 under \$250,000,000	79	79	0	196,580	196,580	0
\$250,000,000 under \$500,000,000	47	47	0	208,930	208,930	0
\$500,000,000 under \$1,000,000,000	63	63	0	276,443	276,443	0
\$1,000,000,000 under \$5,000,000,000	209	209	0	3,036,980	3,036,980	0
\$5,000,000,000 under \$20,000,000,000	182	182	0	3,836,978	3,836,978	0
\$20,000,000,000 and above	197	197	0	10,582,559	10,582,559	0
Form 1120-F returns [12]	20	20	0	86,158	86,158	0
Estate and trust income tax returns	229	204	25	121,756	121,756	[11]
Estate tax returns:						
Total	277	277	0	500,834	500,834	0
Size of gross estate:						
Under \$5,000,000	179	179	0	119,263	119,263	0
\$5,000,000 or more	98	98	0	381,571	381,571	0
Gift tax returns	250	250	0	102,143	102,143	0
Employment tax returns	3,724	3,705	19	246,717	246,544	173
Excise tax returns	588	566	22	80,685	80,418	267
Other taxable returns [15]	60	60	0	221,759	221,759	0

Footnotes at end of table.

Table 10. Examination Coverage: Returns Examined with Unagreed Recommended Additional Tax After Examination, by Type and Size of Return, Fiscal Year 2007—Continued

[Money amounts are in thousands of dollars.]

Footnotes

- d—Not shown to avoid disclosure of information about specific taxpayers. However, the data are included in the appropriate totals.
- [1] Field examinations are generally performed by revenue agents, tax compliance officers, tax examiners, and revenue officer examiners, in person or by correspondence.
- [2] Excludes 10 returns associated with the earned income tax credit (EITC) qualifying child certification test, which is tracked in IRS's examination database.
- [3] Excludes \$22 (thousands) associated with the earned income tax credit (EITC) qualifying child certification test, which is tracked in IRS's examination database.
- [4] In general, TPI (total positive income) is the sum of all positive amounts shown for the various sources of income reported on the individual income tax return and, thus, excludes net losses. Examinations of individual income tax returns are shown in this table by: TPI of under \$200,000; TPI of at least \$200,000 and under \$1,000,000; and TPI of \$1,000,000 or more.
- [5] Includes returns without a Schedule C (nonfarm sole proprietorship), Schedule E (supplemental income and loss), Schedule F (profit or loss from farming), or Form 2106 (employee business expenses).
- [6] Includes returns with a Schedule E (supplemental income and loss) or Form 2106 (employee business expenses). Excludes returns with a Schedule C (nonfarm sole proprietorship) or Schedule F (profit or loss from farming).
- [7] TGR (total gross receipts) is the sum of gross receipts from farm and nonfarm businesses. It is calculated by adding the positive values of gross receipts and other income from Schedule C to the cost of purchased items and gross income (which can be positive or negative) from Schedule F. Schedule C is used to report profit or loss from nonfarm sole proprietorships. Schedule F is used to report profit or loss from farming. If a taxpayer reports both farm and nonfarm income, the return is classified by the larger source of income.
- [8] Includes both business and nonbusiness returns with an earned income tax credit claim. These returns are classified by size of total gross receipts (TGR). Returns are classified as business if they have a Schedule C (nonfarm sole proprietorship) or Schedule F (profit or loss from farming) and TGR is greater than total positive income (TPI). Returns are classified as nonbusiness returns if TGR is less than TPI. See footnotes 4 and 7.
- [9] Includes Forms 1040PR (self-employment tax form for Puerto Rico) and 1040-SS (self-employment tax form for U.S. Virgin Islands, Guam, American Samoa, and the Northern Mariana Islands).
- [10] Includes Forms 1120 ("long form"); 1120-A ("short form"); 1120-F (foreign corporation, except foreign life insurance company); 1120-H (homeowner association); 1120-L (life insurance company); 1120M (mutual insurance company); 1120-PC (property and casualty insurance company); 1120-POL (certain political association); 1120-REIT (real estate investment trust); 1120-RIC (regulated investment company); and 1120-SF (settlement fund). Excludes certain other types of corporations, which are included in "other taxable returns" described in footnote 15.
- [11] Less than \$500.
- [12] Form 1120-F is filed by a foreign corporation with U.S. income, other than a foreign life insurance company and foreign sales corporation.
- [13] Includes returns with assets of less than \$10 million examined by either the Small Business/Self-Employed Operating Division or the Large and Mid-Size Business Operating Division.
- [14] Includes returns with assets of \$10 million or more examined by either the Small Business/Self-Employed Operating Division or the Large and Mid-Size Business Operating Division.
- [15] Includes Forms 1120S for an S corporation reporting a tax; 1120-FSC (foreign sales corporation); 8288 (withholding tax returns for disposition by foreign persons of U.S. property interests); 990-C (farmers' cooperative association); and 8804 (partnership withholding).

NOTES: Detail may not add to totals because of rounding. Excludes excise tax returns filed with the Customs Service and the Alcohol and Tobacco Tax and Trade Bureau, and returns of tax-exempt organizations, Government entities, and employee plans.

SOURCE: Small Business/Self-Employed, Examination, Examination Planning and Delivery, Examination Management Information Systems and Automation SE:S:E:EPD:MISA

Table 11. Examination Coverage: Returns Examined Involving Protection of Revenue Base, by Type and Size of Return, Fiscal Year 2007 [1] [Money amounts are in thousands of dollars.]

		Taxable returns examined		Amount protected		
Type and size of return	Total	Field [2]	Correspondence	Total	Field [2]	Correspondence
	(1)	(2)	(3)	(4)	(5)	(6)
Jnited States, total	89,656	39,645	50,011	5,116,490	5,003,931	112,559
Individual income tax returns, total	[3] 61,706	11,696	50,010	[4] 401,590	289,031	112,559
Returns with TPI under \$200,000 [5]:	[-],	,		[1] 101,000		,
Nonbusiness returns without						
earned income tax credit:						
Selected nonbusiness returns [6]	3,589	1,339	2,250	18,744	12,532	6,212
With Schedule E or Form 2106 [7]	29,708	3,432	26,276	89,430	28,801	60,629
Business and nonbusiness returns	· · · · · · · · · · · · · · · · · · ·	· · · · · · · · · · · · · · · · · · ·	,	,	,	,
with earned income tax credit						
by size of TGR [8, 9]:						
Under \$25,000	11,609	301	11,308	21,538	999	20,539
\$25,000 or more	2,273	395	1,878	5,674	2,320	3,354
Business returns without	2,213	393	1,070	3,074	2,320	3,334
earned income tax credit:						
Nonfarm business returns by size of TGR [8	1.					
	•	944	4.070	15 100	2.040	44.074
Under \$25,000	5,916		4,972	15,192	3,818	11,374
\$25,000 under \$100,000	2,894	814	2,080	8,631	4,130	4,501
\$100,000 under \$200,000	1,289	854	435	9,625	7,462	2,163
\$200,000 or more	346	195	151	1,448	1,006	442
Farm returns	273	d	d	850	d	d
Returns with TPI at least \$200,000						
and under \$1,000,000:						
Nonbusiness returns	1,467	1,244	223	24,347	23,094	1,253
Business returns	1,253	1,112	141	19,796	18,579	1,217
Returns with TPI of \$1,000,000 or more	1,010	952	58	186,155	185,833	322
International returns [10]	79	d	d	160	d	d
Corporation income tax returns,						
except Form 1120S, total [11]	1,548	d	d	d	d	d
Returns other than Form 1120-F [12]:						
Small corporations [13]	372	372	0	362,099	362,099	0
No balance sheet returns	78	78	0	226,377	226,377	0
Balance sheet returns by size of total assets	:					
Under \$250,000	99	99	0	102,740	102,740	0
\$250,000 under \$1,000,000	45	45	0	439	439	0
\$1,000,000 under \$5,000,000	101	101	0	30,481	30,481	0
\$5,000,000 under \$10,000,000	49	49	0	2,062	2,062	0
Large corporations [14]	1,135	d	d	d	d	d
Balance sheet returns by size of total assets	,	<u> </u>			-	
\$10,000,000 under \$50,000,000	. 143	143	0	12,067	12,067	0
\$50,000,000 under \$100,000,000	59	d	d	12,007 d	12,007 d	d
\$100,000,000 under \$100,000,000 \$100,000,000 under \$250,000,000	111	u	0	44,971	44,971	0
\$250,000,000 under \$250,000,000	99	99	0	173.466	173,466	0
				-,		
\$500,000,000 under \$1,000,000,000	105	d	<u>d</u>	d	d	d
\$1,000,000,000 under \$5,000,000,000	262	262	0	562,621	562,621	0
\$5,000,000,000 under \$20,000,000,000	192	192	0	912,720	912,720	0
\$20,000,000,000 and above	164	164	0	2,072,722	2,072,722	0
Form 1120-F returns [12]	41	d	d	d	d	d
Estate and trust income tax returns	120	120	0	17,135	17,135	0
Estate tax returns:						
Total	267	267	0	97,187	97,187	0
Size of gross estate:						
Under \$5,000,000	209	209	0	22,094	22,094	0
\$5,000,000 or more	58	58	0	75,093	75,093	0
Gift tax returns	25	d	d	d	d	d
Employment tax returns	232	232	0	119,056	119,056	0
Excise tax returns	25,032	25,032	0	148,828	148,828	0
Other taxable returns [15]	726	726	0	43,916	43,916	0

Footnotes at end of table.

Table 11. Examination Coverage: Returns Examined Involving Protection of Revenue Base, by Type and Size of Return, Fiscal Year 2007 [1]—Continued

Footnotes

- d—Not shown to avoid disclosure of information about specific taxpayers. However, the data are included in the appropriate totals.
- [1] Protection of the revenue base comprises any action taken by the Internal Revenue Service to prevent the release of funds from the U.S. Treasury in response to taxpayer efforts to recoup all, or part, of previously assessed and paid tax.
- [2] Field examinations are generally performed by revenue agents, tax compliance officers, tax examiners, and revenue officer examiners, in person or by correspondence.
- [3] Excludes 6 returns associated with the earned income tax credit (EITC) qualifying child certification test, which is tracked in IRS's examination database.
- [4] Excludes \$8 (thousands) associated with the earned income tax credit (EITC) qualifying child certification test, which is tracked in IRS's examination database.
- [5] In general, TPI (total positive income) is the sum of all positive amounts shown for the various sources of income reported on the individual income tax return and, thus, excludes net losses. Examinations of individual income tax returns are shown in this table by: TPI of under \$200,000; TPI of at least \$200,000 and under \$1,000,000; and TPI of \$1,000,000 or more.
- [6] Includes returns without a Schedule C (nonfarm sole proprietorship), Schedule E (supplemental income and loss), Schedule F (profit or loss from farming), or Form 2106 (employee business expenses).
- [7] Includes returns with a Schedule E (supplemental income and loss) or Form 2106 (employee business expenses). Excludes returns with a Schedule C (nonfarm sole proprietorship) or Schedule F (profit or loss from farming).
- [8] TGR (total gross receipts) is the sum of gross receipts from farm and nonfarm businesses. It is calculated by adding the positive values of gross receipts and other income from Schedule C to the cost of purchased items and gross income (which can be positive or negative) from Schedule F. Schedule C is used to report profit or loss from nonfarm sole proprietorships. Schedule F is used to report profit or loss from farming. If a taxpayer reports both farm and nonfarm income, the return is classified by the larger source of income.
- [9] Includes both business and nonbusiness returns with an earned income tax credit claim. These returns are classified by size of total gross receipts (TGR). Returns are classified as business if they have a Schedule C (nonfarm sole proprietorship) or Schedule F (profit or loss from farming) and TGR is greater than total positive income (TPI). Returns are classified as nonbusiness returns if TGR is less than TPI. See footnotes 4 and 7.
- [10] Includes Forms 1040PR (self-employment tax form for Puerto Rico) and 1040-SS (self-employment tax form for U.S. Virgin Islands, Guam, American Samoa, and the Northern Mariana Islands).
- [11] Includes Forms 1120 ("long form"); 1120-A ("short form"); 1120-F (foreign corporation, except foreign life insurance company); 1120-H (homeowner association); 1120-L (life insurance company); 1120M (mutual insurance company); 1120-PC (property and casualty insurance company); 1120-POL (certain political association); 1120-REIT (real estate investment trust); 1120-RIC (regulated investment company); and 1120-SF (settlement fund). Excludes certain other types of corporations, which are included in "other taxable returns" described in footnote 15.
- [12] Form 1120-F is filed by a foreign corporation with U.S. income, other than a foreign life insurance company and foreign sales corporation.
- [13] Includes returns with assets of less than \$10 million examined by either the Small Business/Self-Employed Operating Division or the Large and Mid-Size Business Operating Division.
- [14] Includes returns with assets of \$10 million or more examined by either the Small Business/Self-Employed Operating Division or the Large and Mid-Size Business Operating Division.
- [15] Includes Forms 1120S for an S corporation reporting a tax; 1120-FSC (foreign sales corporations); 8288 (withholding tax return for disposition by foreign persons of U.S. property interests); 990-C (farmers' cooperative association); and 8804 (partnership withholding).

NOTES: Detail may not add to totals because of rounding. Excludes excise tax returns filed with the Customs Service and the Alcohol and Tobacco Tax and Trade Bureau, and returns of tax-exempt organizations, Government entities, and employee plans.

SOURCE: Small Business/Self-Employed, Examination, Examination Planning and Delivery, Examination Management Information Systems and Automation SE:S:E:EPD:MISA

Table 12. Examination Coverage: Returns Examined Resulting in Refunds, by Type and Size of Return, Fiscal Year 2007

[Money amounts are in thousands of dollars.]

		Taxable returns examined		Recommended refunds		
Type and size of return	Total	Field [1]	Correspondence	Total	Field [1]	Correspondence
	(1)	(2)	(3)	(4)	(5)	(6)
United States, total	77,989	47,620	30,369	7,833,716	7,701,369	132,347
Individual income tax returns, total	[2] 49,225	19,220	30,005	[3] 711,851	589,565	122,286
Returns with TPI under \$200,000 [4]:	[=],===	,		[0]		,
Nonbusiness returns without						
earned income tax credit:						
Selected nonbusiness returns [5]	4,143	2,219	1,924	44,554	38,375	6,179
With Schedule E or Form 2106 [6]	15,904	3,382	12,522	66,417	35,393	31,024
Business and nonbusiness returns	,	,	·	,	, , , , , , , , , , , , , , , , , , ,	,
with earned income tax credit						
by size of TGR [7, 8]:						
Under \$25,000	4,420	397	4,023	7,924	1,536	6,388
\$25,000 or more	2,167	1,401	766	5,968	4,805	1,163
Business returns without	, -	, -		-,	,	,
earned income tax credit:						
Nonfarm business returns by size of TGR [7	7]:					
Under \$25,000	6,077	2,168	3,909	21,096	10,937	10,159
\$25,000 under \$100,000	2,943	1,552	1,391	17,270	13,171	4,099
\$100,000 under \$200,000	2,648	1,739	909	19,532	17,449	2,083
\$200.000 or more	898	804	94	5,465	5,156	309
Farm returns	387	247	140	1,786	1,482	304
	307	241	140	1,700	1,402	304
Returns with TPI at least \$200,000						
and under \$1,000,000:	2.000	4.740	4.000	50.040	44.044	40.000
Nonbusiness returns	3,606	1,718	1,888	53,813	41,811	12,002
Business returns	2,567	1,837	730	46,782	41,467	5,315
Returns with TPI of \$1,000,000 or more	3,448	1,751	1,697	421,216	377,974	43,242
International returns [9]	17	5	12	28	9	19
Corporation income tax returns,						
except Form 1120S, total [10]	2,486	2,436	50	5,743,689	5,738,699	4,990
Returns other than Form 1120-F [11]:						
Small corporations [12]	924	898	26	187,664	185,832	1,832
No balance sheet returns	126	d	d	98,390	d	d
Balance sheet returns by size of total asset	3:					
Under \$250,000	324	309	15	53,275	52,601	674
\$250,000 under \$1,000,000	215	d	d	4,959	d	d
\$1,000,000 under \$5,000,000	190	186	4	5,468	5,346	122
\$5,000,000 under \$10,000,000	69	69	0	25,572	25,572	0
Large corporations [13]	1,508	1,484	24	5,268,384	5,265,226	3,158
Balance sheet returns by size of total asset		.,		-,=,	5,255,225	2,122
\$10,000,000 under \$50,000,000	324	317	7	44,794	43,753	1,041
\$50,000,000 under \$100,000,000	111	107	4	64,512	64,501	11
\$100,000,000 under \$250,000,000	181	d	d d	113,448	d	d
\$250.000.000 under \$500.000.000	144	139	5	223,121	222,321	800
\$500,000,000 under \$1,000,000,000	143	143	0	421,283	421,283	0
			5			
\$1,000,000,000 under \$5,000,000,000	328	323		1,058,927	1,057,732	1,195
\$5,000,000,000 under \$20,000,000,000	148	148	0	938,800	938,800	0
\$20,000,000,000 and above	129	d	d	2,403,499	d	d
Form 1120-F returns [11]	54	54	0	287,641	287,641	0
Estate and trust income tax returns	447	146	301	52,765	49,620	3,145
Estate tax returns:						
Total	765	765	0	113,368	113,368	0
Size of gross estate:						
Under \$5,000,000	497	497	0	47,389	47,389	0
\$5,000,000 or more	268	268	0	65,979	65,979	0
Gift tax returns	29	d	d	3,904	d5,979	d
One tax 16tuilio			3	28,681	28,675	6
Employment toy returns						
Employment tax returns Excise tax returns	476 24,453	473 24,445	8	1,123,620	1,123,617	3

Footnotes at end of table.

Table 12. Examination Coverage: Returns Examined Resulting in Refunds, by Type and Size of Return, Fiscal Year 2007—Continued

Footnotes

- d—Not shown to avoid disclosure of information about specific taxpayers. However, the data are included in the appropriate totals.
- [1] Field examinations are generally performed by revenue agents, tax compliance officers, tax examiners, and revenue officer examiners, in person or by correspondence.
- [2] Excludes 9 returns associated with the earned income tax credit (EITC) qualifying child certification test, which is tracked in IRS's examination database.
- [3] Excludes \$10 (thousands) associated with the earned income tax credit (EITC) qualifying child certification test, which is tracked in IRS's examination database.
- [4] In general, TPI (total positive income) is the sum of all positive amounts shown for the various sources of income reported on the individual income tax return and, thus, excludes net losses. Examinations of individual income tax returns are shown in this table by: TPI of under \$200,000; TPI of at least \$200,000 and under \$1,000,000; and TPI of \$1,000,000 or more.
- [5] Includes returns without a Schedule C (nonfarm sole proprietorship), Schedule E (supplemental income and loss), Schedule F (profit or loss from farming), or Form 2106 (employee business expenses).
- [6] Includes returns with a Schedule E (supplemental income and loss) or Form 2106 (employee business expenses). Excludes returns with a Schedule C (nonfarm sole proprietorship) or Schedule F (profit or loss from farming).
- [7] TGR (total gross receipts) is the sum of gross receipts from farm and nonfarm businesses. It is calculated by adding the positive values of gross receipts and other income from Schedule C to the cost of purchased items and gross income (which can be positive or negative) from Schedule F. Schedule C is used to report profit or loss from nonfarm sole proprietorships. Schedule F is used to report profit or loss from farming. If a taxpayer reports both farm and nonfarm income, the return is classified by the larger source of income.
- [8] Includes both business and nonbusiness returns with an earned income tax credit claim. These returns are classified by size of total gross receipts (TGR). Returns are classified as business if they have a Schedule C (nonfarm sole proprietorship) or Schedule F (profit or loss from farming) and TGR is greater than total positive income (TPI). Returns are classified as nonbusiness returns if TGR is less than TPI. See footnotes 4 and 7.
- [9] Includes Forms 1040PR (self-employment tax form for Puerto Rico) and 1040-SS (self-employment tax form for U.S. Virgin Islands, Guam, American Samoa, and the Northern Mariana Islands).
- [10] Includes Forms 1120 ("long form"); 1120-A ("short form"); 1120-F (foreign corporation, except foreign life insurance company); 1120-H (homeowner association); 1120-L (life insurance company); 1120M (mutual insurance company); 1120-PC (property and casualty insurance company); 1120-POL (certain political association); 1120-REIT (real estate investment trust); 1120-RIC (regulated investment company); and 1120-SF (settlement fund). Excludes certain other types of corporations, which are included in "other taxable returns" described in footnote 14.
- [11] Form 1120-F is filed by a foreign corporation with U.S. income, other than a foreign life insurance company and foreign sales corporation.
- [12] Includes returns with assets of less than \$10 million examined by either the Small Business/Self-Employed Operating Division or the Large and Mid-Size Business Operating Division.
- [13] Includes returns with assets of \$10 million or more examined by either the Small Business/Self-Employed Operating Division or the Large and Mid-Size Business Operating Division.
- [14] Includes Forms 1120S for an S corporation reporting a tax; 1120-FSC (foreign sales corporation); 8288 (withholding tax return for disposition by foreign persons of U.S. property interests); 990-C (farmers' cooperative association); and 8804 (partnership withholding).
- NOTES: Detail may not add to totals because of rounding. Excludes excise tax returns filed with the Customs Service and the Alcohol and Tobacco Tax and Trade Bureau, and returns of tax-exempt organizations, Government entities, and employee plans.
- SOURCE: Small Business/Self-Employed, Examination, Examination Planning and Delivery, Examination Management Information Systems and Automation SE:S:E:EPD:MISA

Table 13. Returns of Tax-Exempt Organizations, Employee Plans, and Government Entities Examined, by Type of Return, Fiscal Year 2007

Type of return	Number of returns	
Total number of returns examined in Fiscal Year 2007	18,682	
Number of tax-exempt organization returns processed in Calendar Year 2006 [1]	867,696	
Tax-exempt organizations and related taxable returns examined, total	7,580	
Tax-exempt organization returns, total	3,850	
Forms 990 and 990-EZ	3,448	
Forms 990-PF, 5227, 1041-A, and 1120 [2]	386	
Form 1120-POL	16	
Related taxable returns, total	3,730	
Employment tax returns [3]	1,787	
Form 990-T [4]	1,026	
Form 4720 [5]	530	
Forms 1040, 1065, and 1120 adjusted [6]	121	
Forms 11-C and 730 [7]	266	
Number of employee plan returns processed in Calendar Year 2006 [8]	1,055,061	
Employee plans and related taxable returns examined, total [9]	8,423	
Employee plan returns, total	6,823	
Form 5500 [10]	5,768	
Defined benefit	486	
Defined contribution	5,282	
Form 5500-EZ	1,055	
Defined benefit	199	
Defined contribution	856	
Related taxable returns, total	1,172	
Form 5330 [11]	963	
Form 990-T [4]	15	
Forms 1040, 1065, and 1120 adjusted [6]	194	
Government entity returns examined, total	2,679	
Tax-exempt bond returns [12]:	476	
Government entity returns [13]:		
Employment tax returns [3]	2,049	
Forms 1040, 1065, and 1120 adjusted [6]	33	
Forms 11-C and 730 [7]	121	

^[1] Includes returns of tax-exempt organizations (Forms 990 and the 990-EZ "short" form), other than farmers' cooperatives (Form 990-C); private foundations (Form 990-PF); split-interest trusts (Form 5227); trust accumulations of certain charitable amounts (Form 1041-A filed by a tax-exempt organization); and Form 1120-POL filed by political organizations and certain tax-exempt organizations to report political organization taxable income and tax.

- [4] Form 990-T is the tax-exempt organization unrelated business income tax return.
- [5] Form 4720 reports the excise tax on exempt organizations and related individuals.
- [6] Related individual (Form 1040 series), partnership (Form 1065), or corporation (Form 1120 series) adjusted as a result of examination of a tax-exempt organization, employee plan, or Government entity.
- [7] Form 11-C reports the occupational tax for wagering, and Form 730 reports the excise tax on wagering.
- [8] Includes both Forms 5500 and 5500-EZ returns, but excludes welfare benefit plans and fringe benefit plans, which are not subject to examination by IRS.
- [9] Includes 428 examinations of plans that were not required to file a return and are, therefore, not categorized by form type.
- [10] Includes examinations of Forms 5500C/R filed prior to November 1999.
- [11] Form 5330 reports initial excise taxes related to employee plans.
- [12] Includes tax-exempt private activity bond issues (Form 8038); Government-purpose tax-exempt bond issues (Form 8038-G); small tax-exempt bond issues (Form 8038-G); arbitrage rebates (Form 8038-T); and carryover election of unused private activity bond volume cap (Form 8328).
- [13] Includes returns of Federal, State, local. and Indian Tribal governments. Although these entities do not have a primary return filing requirement, they are subject to excise and employment taxes.

NOTES: In general, examination activity for a fiscal year may be associated with returns filed in the previous calendar year. However, this relationship is only approximate. Counts of returns processed exclude related taxable returns.

SOURCES: Tax Exempt and Government Entities, Exempt Organizations SE:T:EO; Employee Plans SE:T:EP; and Government Entities SE:T:GE

^[2] Includes corporation income tax returns (Form 1120) of revoked private foundations.

^[3] Includes employer's unemployment tax (Form 940); employer returns for income and Social Security tax withheld and advance earned income credit payments (Form 941); agricultural employee tax (Form 943); employer tax return (Form 944); other income tax withholding (Form 945); and foreign employee tax (Form 1042).